RECEIVED
SEP X 8 2008
B: ___ 9-5-08

September 5, 2008

Judy Lombardo
IDEM Office of Air Quality
100 North Senate Avenue,
MC 61-53, IGC-N 1003
Indianapolis, IN 46205

RE: INCMA Comments on Proposed revisions to Non-Rule Policy Document Air-007-NPD-R2

On behalf of the Indiana Cast Metals Association (INCMA), I appreciate the opportunity to submit comments on the proposed revisions to IDEM's non-rule policy document on Title V and FESOP annual compliance certifications [Air-007-NPD-R2]. INCMA supports the revised language as a positive step forward to streamlining reporting information without sacrificing the need for public information. We believe these both reflect success on equally important goals and are consistent with the US EPA's Title V Performance Task Force recommendations.

We offer only one critique in that we believe that the requirement to provide individual deviations is unnecessary. It duplicates the same requirement already associated with quarterly deviation reports and would seem less appropriate and less necessary for a streamlined annual certification.

Thank you again for the opportunity to submit comments. If you have any questions, please contact me at 317/974-1830 or by e-mail at INCMAoffice@ameritech.net

Sincerely,

Blake Jeffery
Executive Director

Recycled Paper